

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10195-PBS
)	
MICHAEL PINA)	

ASSENTED-TO MOTION TO EXTEND TIME TO FILE JOINT STATUS REPORT

Defendant, Michael , moves that the Court extend by sixty days the time by which the parties must file the joint status report as ordered in the Court's Procedural Order issued March 27, 2008. As reason therefore, undersigned counsel states that his review of defendant's Presentence Report and Judgment, as well as his consultations with the Probation Department and the relevant Assistant U.S. Attorney, indicates that defendant's sentence was driven by a binding plea agreement as well as his status as a Career Offender and that he is therefore ineligible for a reduction pursuant to U.S.S.G. §1B1.10. Undersigned counsel has not yet been in contact with defendant and thus requires an additional period of time to notify defendant of the results of his review and to receive additional instructions from defendant before filing the joint status report. Defendant therefore requests that the Court extend the time for filing the joint status report to May 23, 2008.

The government assents to this Motion.

MICHAEL PINA
By His Attorney:

/s/ Timothy G. Watkins
Timothy G. Watkins
B.B.O. #567992
Federal Defender Office
408 Atlantic Avenue, 3rd Floor
Boston, MA 02110
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), as well as to U.S. Probation Officer Susan Walls by electronic mail, on April 23, 2008.

/s/ Timothy G. Watkins
Timothy G. Watkins